

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

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STATE OF TEXAS, ET AL.; §  
§  
*Plaintiffs,* §  
§  
v. § Case No. 1:18-cv-00068  
§  
UNITED STATES OF AMERICA, ET AL.; §  
§  
*Defendants,* §  
§  
*and* §  
§  
KARLA PEREZ, ET AL.; §  
§  
STATE OF NEW JERSEY, §  
§  
*Defendants-Intervenors.* §

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**PLAINTIFF STATES' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE  
LIMIT ON THEIR MOTION FOR SUMMARY JUDGMENT**

Plaintiff States respectfully request that the Court grant permission to exceed the 20-page briefing limit by 30 pages in their Motion for Summary Judgment. Plaintiff States' Motion for Summary Judgment raises complex issues in a case of national importance, and Plaintiff States require these extra pages to adequately present these issues to the Court. Plaintiff States seek this extension for good cause and in the interest of justice, not for delay, and no party will be prejudiced if the extension is granted. The other parties do not oppose the request.

**CONCLUSION**

Plaintiff States respectfully request that the Court grant their motion for leave to exceed page limits.

Date: January 31, 2023

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Respectfully submitted.

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**CERTIFICATE OF CONFERENCE**

I certify that on January 30, 2023, counsel for Plaintiff States conferred with counsel for the other parties in this case via email.

James Walker, counsel for Defendants United States of America, et al., Nina Perales, counsel for Defendant-Intervenors Karla Perez, et al., and Mayur Saxena, counsel for Defendant-Intervenor State of New Jersey, represented that the parties whom they represent, respectively, do not oppose the relief requested by Plaintiff States.

*/s/ Leif A. Olson*  
LEIF A. OLSON

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed and served electronically (via CM/ECF) on January 31, 2023.

*/s/ Leif A. Olson*  
LEIF A. OLSON